

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JIM MOORE

Plaintiff,

- against -

Index No. 08-cv-3840 (JGK) (JCF)

BRITISH BROADCASTING COMPANY,
DISCOVERY COMMUNICATIONS, LLC.,
WALL TO WALL PRODUCTIONS, INC.,
MAGNOLIA PICTURES, INC.,
POLARIS IMAGES CORPORATION,
THE WORKS MEDIA GROUP, PLC.,
JP PAPPIS, and SIMON CHINN

Defendants.
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PROPOSED SCHEDULING ORDER

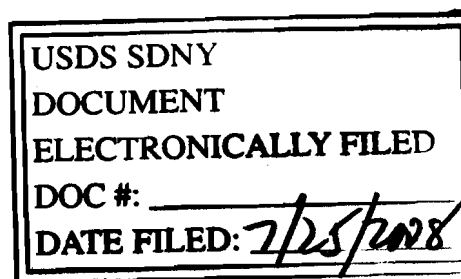
Pursuant to FRCP 26(f), counsel for the parties that have appeared in the above-identified action, plaintiff Jim Moore, defendant Discovery Communications, LLC, defendant Wall to Wall (Egypt) Ltd., defendant Polaris Images Corporation and defendant JP Pappis (the "Parties"), have met and conferred regarding scheduling. The Parties discussed their claims and the possibilities of settlement and jointly propose the following discovery schedule:

A. Rule 26(a) Disclosures:

Initial disclosures required by FRCP 26(a)(1) are waived.

B. Discovery Schedule:

1. Initial Discovery Requests. Initial requests for production of documents and interrogatories (as permitted by the Local Rules for the Southern District of New York) will be served by August 19, 2008 with responses due under the time frame permitted by the FRCP.



2. Fact Depositions. The Parties expect that there will be approximately eight (8) party and other fact depositions. At this point, the Parties have identified the following such witnesses: Jim Moore, JP Pappis, James Marsh, Philippe Petit, Kathy O'Donnell, Kelly Price, Simon Chinn, and a representative of defendant Discovery. The location and method of the Chinn and Discovery depositions shall be determined pursuant to the FRCP. These depositions will be completed by October 31, 2008.

3. Expert Disclosure. **PLAINTIFF'S POSITION:**

~~Expert disclosure as required by FRCP 26(a)(2) shall be completed by November 14, 2008. Expert depositions shall be conducted by December 19, 2008.~~

DEFENDANTS' POSITION:

Plaintiff will provide defendants with any disclosures with respect to experts required by FRCP 26(a)(2) by no later than October 15, 2008 and Defendants will provide such disclosures by November 14, 2008. Depositions of experts will be concluded by December 19, 2008.

4. Completion of Discovery. All discovery will be completed by December 19, 2008.

C. Electronic Disclosure:

Electronically Stored Information: The Parties agree to preserve all relevant electronic information.

D. Privilege

1. The Parties will determine any privilege issues in accordance with the Local Rules and the FRCP.

E. Miscellaneous:

1. Other Named Defendants. Plaintiff will serve the defendants other than the appearing Parties by August 19, 2008 or withdraw the complaint as against any named defendant that has not been served by that date.

2. Amendment of Caption. Plaintiff, with the consent of the appropriate defendant, will amend the caption to change the party name "Wall to Wall Productions, Inc." to "Wall to Wall (Egypt) Ltd." by the completion of discovery.

F. Summary Judgment motions (if any) are to be served by January 30, 2009.

G. Pretrial conference to be held on *Joint Pre-Trial Order is due 2/20/09. Ready Trial date or 48 hours noted in March 6, 2009.* *
Approved by the following parties:

KORNFELD & ASSOCIATES, P.C.
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SO ORDERED this 23 day of July, 2008

[Signature]
UNITED STATES DISTRICT JUDGE

* The date of the Joint Pre-Trial Order and the Ready Trial Date will be adjourned to a date 3 weeks and 4 weeks respectively (after a decision on any motion for summary judgment)